

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**IN RE: JERONE ALAN JACKSON, A/K/A  
JERONE A. JACKSON, D/B/A  
MY THREE JS LAWN SERVICE,  
Debtor**

**CASE NO. 17-30655**

**CHAPTER 13**

**RUSHMORE LOAN MANAGEMENT SERVICES,  
LLC AS SERVICER FOR MTGLQ INVESTORS,  
L.P.**

**MOVANT**

**VS.**

**JERONE ALAN JACKSON, Debtor;  
and GEORGE W. STEVENSON, Trustee**

**RESPONDENTS**

**OBJECTION TO CONFIRMATION**

Comes now Rushmore Loan Management Services, LLC as servicer for MTGLQ Investors, L.P., a secured creditor of the above named Debtor, and a party in these proceedings, (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., and for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor, Jerone Alan Jackson, states:

1. Movant is the servicer of a promissory note, which is secured by a mortgage covering the real property listed in the Chapter 13 plan of Debtor, commonly known as 4213 Indian Brook Cove, Memphis, TN 38125.

2. Pursuant to 11 U.S.C. §1324, Movant objects to said Chapter 13 plan because the Debtor's plan provides for arrearages of \$4,080.00. However, the arrearages in the Proof of Claim, are in amount of \$12,637.22, pending approval. Debtor should modify their plan to provide for the correct arrearage and the ongoing payment.

3. Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor, and prays that this Court deny such confirmation, for its attorney's fees herein and for all other just and proper relief.

Respectfully Submitted,

WILSON & ASSOCIATES, P.L.L.C.

/s/ Heather Martin-Herron

Joel W. Giddens (016700)

James Bergstrom (20622)

Heather Martin-Herron (032248)

Angela Boyd Mathews (033125)

Michael G. Clifford (028691)

Michael N. Wennerlund (031332)

5050 Poplar, Suite 1015

Memphis, TN 38157

(901) 578-9914

Attorneys for Movant

**CERTIFICATE OF SERVICE**

On January 31, 2018, a copy of the foregoing was served via electronic mail, upon:

Gwen Hewitt  
Attorney at Law  
5050 Poplar Avenue, Suite 2400  
Memphis, TN 38157

George W. Stevenson  
Trustee  
5350 Poplar Avenue, Suite 500  
Memphis, TN 38119-3697

and sent via first class mail to:

Jerone Alan Jackson  
Debtor  
4213 Indian Brook Cove  
Memphis, TN 38125

/s/ Heather Martin-Herron

Joel W. Giddens (016700)  
Heather Martin-Herron (032248)  
Angela Boyd Mathews (033125)  
James Bergstrom (20622)

W&A. 120552 / Loan No. XXXXXX0749